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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

## SAN FRANCISCO DIVISION

18 SHAHRIAR JABBARI and KAYLEE  
19 HEFFELFINGER, on behalf of themselves  
and all others similarly situated.

20 Plaintiffs.

21 || vs.

22 WELLS FARGO & COMPANY and WELLS  
FARGO BANK, N.A..

## Defendants

Case No. 15-CV-02159 VC

**[PROPOSED] ORDER GRANTING  
STIPULATION TO UNSEAL MOTIONS  
TO COMPEL ARBITRATION AND  
RELATED FILINGS AND [PROPOSED]  
ORDER**

Judge: Hon. Vince Chhabria  
Ctrm.: 4

Action Filed: May 13, 2015

[PROPOSED] ORDER GRANTING  
STIPULATION TO UNSEAL  
CASE NO. 15-CV-02159

1 Pursuant to the stipulation of counsel,

2 (i) Defendants' motions to dismiss Jabbari and Heffelfinger's claims (ECF 29 and 50)

3 shall be unsealed and publicly filed;

4 (ii) The Kotzman declarations in support of Defendants' motions to compel arbitration

5 of Jabbari and Heffelfinger's claims (ECF 29-1 and 49-2) shall be unsealed and

6 publicly filed; and

7 (iii) Exhibits 5-97 to the Kotzman declaration in the Jabbari filing (ECF 26-7 to 28-47)

8 and Exhibits 3-38 to the Kotzman declaration in the Heffelfinger filing (ECF 48-7

9 and 48-8) shall be submitted under seal. Defendants shall publicly file versions of

10 these exhibits that redact references to Plaintiffs' account numbers, taxpayer-

11 identification numbers, social-security numbers, and birth dates consistent with

12 Federal Rule of Civil Procedure 5.2, and that redact Plaintiffs' driver's license and

13 passport numbers.

14 IT IS SO ORDERED.

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16 Dated: August 28, 2015

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The Honorable Vince Chhabria  
District Judge

Submitted by:  
MUNGER, TOLLES & OLSON LLP

By: /s/ David H. Fry  
DAVID H. FRY

Attorneys for Defendants,  
WELLS FARGO & COMPANY AND  
WELLS FARGO BANK, N.A.